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Attorney for Plaintiff

MONTANA FOURTH JUDICIAL DISTRICT COURT,  
MISSOULA COUNTY

MICHAEL RYAN,

Plaintiff,

vs.

UNITED PARCEL SERVICE, INC.,

Defendant.

Case No.: \_\_\_\_\_

Dept. No.: \_\_\_\_\_

**COMPLAINT and  
DEMAND FOR JURY TRIAL**

COMES NOW the Plaintiff, Michael Ryan, by and through his attorney

Torrance L. Coburn of TIPP COBURN & ASSOCIATES PC, and for his

Complaint against the Defendant, states and alleges as follows:

1. Plaintiff is an individual who resides in Missoula County, Montana.
2. Defendant United Parcel Service, Inc. is an Ohio corporation with its principal office address located at 55 Glenlake Parkway NE, Atlanta GA 30328. The Defendant has conducted and currently conducts business in Montana, and is authorized to do the same. The registered agent for the Defendant is Corporation Service Company, at 26 W. Sixth Avenue, Helena, Montana 59624-1691.
3. Venue and jurisdiction are proper in this Court.

4. The Plaintiff began his employment with the Defendant on or around October 2007.

5. The Defendant terminated the Plaintiff's employment on or around August 18, 2020.

6. The Plaintiff's position at the time of his termination by the Defendant was Local Sort Supervisor. At the time of his termination by the Defendant, the Plaintiff earned \$19.61 per hour.

7. Prior to his termination the Plaintiff completed the Defendant's probationary period of employment.

8. During the course of the Plaintiff's employment with the Defendant, the Plaintiff adequately and satisfactorily performed the duties of his position as Local Sort Supervisor.

9. In performing the duties of his employment, the Plaintiff was not a disruption to the operation of the Defendant's business.

10. No legitimate business reason existed to terminate the Plaintiff's employment.

11. The termination of the Plaintiff's employment by the Defendant was without good cause.

12.The Defendant’s termination of the Plaintiff’s employment constitutes wrongful discharge as contemplated and defined by Montana Code Annotated § 39-2-901, et seq.

13.Due to the Defendant’s wrongful termination of the Plaintiff, the Plaintiff is entitled to recover from the Defendant all damages as allowed by law, which include lost wages and lost fringe benefits, in an amount to be determined at trial.

WHEREFORE, the Plaintiff prays for relief as follows:

A. For judgment against the Defendant in the amount of the Plaintiff’s actual, general and special damages;

B. For Plaintiff’s costs incurred in this action; and

C. For such other and further relief as this Court deems just, equitable and allowable under the laws of the State of Montana.

DATED this 3<sup>rd</sup> day of March, 2021.

TIPP COBURN & ASSOCIATES PC

/s/ Torrance L. Coburn

Torrance L. Coburn

2200 Brooks Street

P.O. Box 3778

Missoula, MT 59806-3778

*Attorneys for Plaintiff*

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**DEMAND FOR JURY TRIAL**

COMES NOW the Plaintiff, by and through his attorneys TIPP COBURN & ASSOCIATES PC, and demand a jury trial on all issues of fact in the above case.

DATED this 3<sup>rd</sup> day of March, 2021.

TIPP COBURN & ASSOCIATES PC

/s/ Torrance L. Coburn

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